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August 17, 2015

VIA ECF AND HAND DELIVERY

Judge Stuart M. Bernstein
United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, NY 10004-1408

Re: Picard v. Cohmad Securities Corp., et al., Adv. Pro. No. 09-01305 (SMB)

Dear Judge Bernstein:

We are counsel to Irving H. Picard, Esq., the Trustee for the substantively consolidated SIPA liquidation proceedings of Bernard L. Madoff Investment Securities LLC and the estate of Bernard L. Madoff (collectively, "BLMIS"). We write regarding the conference scheduled for tomorrow, August 18, 2015, at 10:00 a.m., regarding Defendants Alvin and Carole Delaires' (the "Delaries") failure to participate in discovery (the "Conference"). See 7/28/15 Ltr. from K. Zunno to J. Bernstein (detailing the need for such hearing).

We have reviewed Delaires' counsel's August 14, 2015, letter to Your Honor requesting the adjournment of the Conference, as well as his letter of the same date to my colleague, Esterina Giuliani, responding to the Trustee's April 28, 2015 letter regarding open discovery issues. We can advise the Court that Delaires' counsel has agreed to meet-and-confer with the Trustee on September 2, 2015. Accordingly, the Trustee consents to the adjournment of the Conference; however, we respectfully request that the Court adjourn the Conference to a date in early October. In the event such Conference is not necessary, the parties will contact the Court.

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Respectfully,



Kathryn M. Zunno

Enclosures

cc: All counsel of record (via ECF and email)
Ms. Jane M. Delaire, *pro se* (via email)
Mr. Edward H. Kohlschreiber, *pro se* (via First Class Mail)